

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:

TIMEKEEPERS INC.

Case No: 24-51101-mmp
Chapter 11

MOTION FOR ADMISSION PRO HAC VICE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now C. Jared Knight ("Applicant") moves this court to grant admission to the United States Bankruptcy Court for the Western District of Texas *pro hac vice* to represent FirstBank Southwest in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of)

Morgan Williamson LLP,

with offices at

Mailing address: 701 S Taylor, Ste 324

City, State, Zip: Amarillo, TX 79101

Telephone: 806.358.8116 Fax: 806.358.3154

Email Address: jknight@mw-law.com

2. Since November 3, 1995, Applicant has been and presently is a member of and in good standing with the Bar of the State of Texas. Applicant's bar license number is 00794107.

3. Applicant has been admitted to practice before the following state and federal courts:

Court:	Admission date:
All courts of State of Texas	November 3, 1995
US Dist Ct for Northern Dist of Tx	January 7, 1997
US Dist Ct. for Eastern Dist of Tx	January 7, 2020
US Dist Ct for Southern Dist of Tx	September 20, 2023

4. Applicant is presently a member in good standing of the bars of the courts listed above, and is not currently suspended or disbarred in any other court, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

N/A

5. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided below:

N/A

6. Applicant is eligible to practice in the Bankruptcy Court.

7. Applicant has read and is familiar with the Local Rules of the Western District of Texas Bankruptcy Court and is also subject to all rules of practice of the U.S. District Court of the Western District of Texas and will comply with the standards of practice set out therein.

8. Applicant has not requested admission pro hac vice in the Bankruptcy Court for the Western District of Texas in the preceding twelve months.

or

Applicant has filed the motions for admission pro hac vice in the preceding twelve months.

Case Name/Number Date Filed Disposition of Motion

Wherefore, Applicant prays that this Court enter an order permitting the admission of C. Jared Knight to the U.S. Bankruptcy Court Western District of Texas *pro hac vice* for this case only.

Respectfully submitted,


[Signature of Applicant]

C. Jared Knight +
[Printed name of Applicant]

701 S. Taylor, Ste 324 Amarillo, TX 79101 +
[Address of Applicant]

806-358-8116
[Telephone of Applicant]

jknights@mw-law.com +
[Email address of Applicant]

CERTIFICATE OF SERVICE

The undersigned certifies that on July 22, 2024, a true and correct copy of the proceeding was served to all parties requesting notice via the Court's CM/ECF system, on all person consenting to such service , and on the persons indicated below.

Via CM/ECF
Michael G. Colvard
Martin & Drought, PC
Weston Cetnre
112 E Pecan St, Suite 1616
San Antonio, TX 78205
Trustee

Via CM/ECF
Morris Eugene White III
Villa & White LLP
100 NE Loop 410 Suite 615
San Antonio, TX 78216
Debtor(s)' Attorney

Via CM/ECF
Office of the United States Trustee
Aubrey L. Thomas
Assistant U.S. Trustee
615 E Houston Street, Suite 533
San Antonio, TX 78205

Via U.S. Mail
TIMEKEEPERS INC.
1015 S School St
Boerne, TX 78006
Debtor


C. Jared Knight
MORGAN WILLIAMSON LLP
701 S. Taylor, Suite 324
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EXHIBIT “A”

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:

TIMEKEEPERS INC.

Case No.: 24-51101-MMP

Chapter: 11

ORDER

BE IT REMEMBERED that there was presented to the Court the motion for Admission *Pro Hac Vice* filed by C. Jared Knight ("Applicant") and the Court, having reviewed the motion, has decided it is meritorious.

ACCORDINGLY, IT IS ORDERED that the Motion for Admission *Pro Hac Vice* is GRANTED, and Applicant may appear on behalf of FirstBank Southwest in the above case.

This order shall not be considered admission to practice generally before this Court or the U.S. District Court for the Western District of Texas.

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Prepared By:

C. Jared Knight

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